New model aquatic animal health certificates No. 1-5

General Comment

The United States supports the Commission's goal of coordinating the establishment of model health certificates in parallel with the new disease chapters in preparation for the eighth edition (2005) of the Aquatic Code.

Specific Comment

However, we would like clarification concerning the proposed deletion of the text "And any of the following if required by the importing country" from the table of the Declaration section of all 5 models of the international aquatic animal health certificates. We interpret the removal of this text as implying that either a) the product or animal, eggs or gametes have been tested for **all** of the diseases listed *or* b) the product or animal, eggs or gametes originate from a country, zone, etc. that is free of **all** the listed diseases based on surveillance data.

If the animal, eggs, or gametes are not susceptible to any or all of the listed diseases in the Declaration section, then there is no justification for testing. Additionally, the criteria to declare a country, zone etc. as free of all listed diseases includes a surveillance program, and currently many countries do not have surveillance for all of the listed pathogens.

If our interpretation of the proposed change is correct, we do not support the deletion of the text "And any of the following if required by the importing country" from the table of the Declaration section of all 5 models of the International Aquatic Animal Health Certificates.